

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CHRISTINA MONGELLI,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C. A. No. 05-359-SLR
	)	
RED CLAY CONSOLIDATED SCHOOL	)	
DISTRICT BOARD OF EDUCATION,	)	
et al.,	)	
Defendant.	)	

**DEFENDANTS' PROPOSED VOIR DIRE TO JURY PANEL**

Good morning, ladies and gentlemen. I am Judge Robinson, and I will be presiding over the trial for which a jury is about to be drawn in the case captioned *Christina Mongelli v. Red Clay Consolidated School District Board of Education, [waiting for ruling on caption change]*. Briefly stated, this case is a civil action brought by plaintiff, Christina Mongelli, against the defendant(s) Red Clay Consolidated School District Board of Education **[waiting for ruling on caption change]**.

The trial is expected to last from June 18 to June 21; our trial days will run approximately from 9:30 a.m. to 4:30 p.m.

Plaintiff is represented by Joseph M. Bernstein, Esquire. Defendants are represented by Barry M. Willoughby, Esquire and Michael P. Stafford, Esquire, attorneys with Young Conaway Stargatt & Taylor, LLP.

In the light of this brief summary, I will ask the panel certain questions, the purpose of which is to: (1) enable the court to determine whether or not any prospective juror should be excused for cause; and (2) enable counsel for the parties to exercise their individual judgment with respect to peremptory challenges, that is, challenges for which no reason need be

given by counsel. If any of you answer any question "yes," please stand up and, upon being recognized by the court, state your juror number. When I have concluded asking all the questions, we will call you to the bench individually to speak with you about your affirmative response or responses.

**HAVE CLERK ADMINISTER THE OATH TO THE PANEL**

1. Is any member of the panel related to the plaintiff?
2. Is any member of the panel personally acquainted with any officer, director, or employee of, or ever done business with Red Clay Consolidated School District Board of Education?
3. Is any member of the panel related to, or personally acquainted with Joseph M. Bernstein, Esquire, plaintiff's attorney or ever been represented by him or by any associate or member of his law firm?
4. Is any member of the panel related to, or personally acquainted with Barry M. Willoughby, Esquire or Michael P. Stafford, Esquire, defendants' attorneys or ever been represented by them or by any associate or member of their law firm, Young Conaway Stargatt & Taylor, LLP?
5. Is any member of the panel related to, or personally acquainted with, any of the following individuals who might appear as witnesses in this case:

Christina Mongelli

Joy Mongelli

Michael Mongelli

Chad Carmack

John Kennedy

Rachel Williams

Michael Wexler

Janine Carello

Gerald Thompson

Officer Alex J. Nowell

Debra Davenport

Diane Dunmon

Karen L. Muller, MA., NCSP

Kristen Norton

NOTE: The witness list is subject to change based on objections and Court rulings on motions in limine.

6. Does any member of the panel have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it?

7. Has any member of the panel ever been a plaintiff or a defendant in a civil lawsuit?

8. Has any member of the panel ever served as a juror in a civil lawsuit?

9. Does any member of the panel have any special disability or problem that would make it difficult or impossible for you to serve as a member of the jury in this case?

10. Does any member of the panel know of any other matter which you believe should be called to the court's attention as having some bearing upon your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?

11. Have you or any member of your immediate family or a close relative ever attended John Dickinson High School?

12. Do you presently reside within the boundaries of the Red Clay Consolidated School District?